

## **DEFINITIONS**

1. “Reading” means the City of Reading, Pennsylvania, its agents, attorneys, principals, elected officials, appointed officials and each person acting or authorized to act on its behalf.
2. The “Reading WWTP” means the publically owned treatment works located at Route 10, Morgantown Road in Reading, PA owned and operated by the City of Reading. The Reading WWTP provides wastewater treatment service for the City of Reading and portions of other municipalities.
3. “Consent Decree” means the Consent Decree entered into between the United States of America, the Commonwealth of Pennsylvania and the City of Reading and executed on or about November 7, 2005.

## **REQUESTS**

1. Produce all minutes, including drafts, of meetings and telephone conferences involving any current or former Reading employee and/or current or former members of Reading’s City Council and/or any other current or former Reading elected official and the United States Environmental Protection Agency (“EPA”) relating to the Reading WWTP from 2002 to the present.
2. Produce all minutes, including drafts, of meetings and telephone conferences involving any current or former Reading employee and/or current or former members of Reading’s City Council and/or any other current or former Reading elected official and/or the EPA and the United States Department of Justice relating to the Reading WWTP from 2002 to the present.
3. Produce all communications the EPA sent to or received from Reading regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

4. Produce all communications the EPA sent to or received from Hill International regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
5. Produce all communications the EPA sent to or received from Hazen & Sawyer regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
6. Produce all communications the EPA sent to or received from Weston Solutions regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
7. Produce all communications the EPA sent to or received from Dave Binder regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
8. Produce all communications the EPA sent to or received from Charles Jones regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
9. Produce all communications the EPA sent to or received from Deborah Hoag regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
10. Produce all communications the EPA sent to or received from Leon Churchill regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
11. Produce all communications the EPA sent to or received from Carl Geffken regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
12. Produce all documents the EPA sent to or received from Reading regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.
13. Produce all documents Christopher A. Day, Senior Assistant Regional Counsel, sent to or received from Reading regarding the Reading WWTP and/or the Consent Decree.
14. Produce all documents the EPA sent to or received from W. Benjamin Fisherhow, Deputy Chief, Environmental Enforcement Division, Environmental and Natural Resources Division, U.S. Department of Justice, regarding the Reading WWTP and/or the Consent Decree.

15. All documents the EPA sent to or received from the U.S. Department of Justice regarding the Reading WWTP and/or the Consent Decree.

16. Produce all documents Reading sent to or received from Lisa Trakis of the EPA regarding the Reading WWTP and/or the Consent Decree.

17. Produce all communications the EPA sent to or received from RK&K Inc. regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

18. Produce all communications the EPA sent to or received from Carole Snyder regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

19. Produce all communications the EPA sent to or received from Keith Mooney regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

20. Produce all communications the EPA sent to or received from Vaughn Spencer, Reading's current Mayor and former member of the City Council, regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

21. Produce all communications the EPA sent to or received from the United States Department of Justice regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

22. Produce all communications the EPA sent to or received from Margaret Hutchinson regarding the Reading WWTP and/or the Consent Decree from 2002 to the present.

23. Produce all documents the EPA sent to or received from Ronald Williams, Christopher Roe, John Miravich, Derald Hay, J. Benjamin Nevius, Chris Popper or any other person working at the law firm of Fox Rothschild regarding the Reading WWTP and/or the Consent Decree.